

Office of the Secretary

Federal Communications Commission

Disability Rights Office

Room 3-B431

9300 East Hampton Drive

Capitol Heights, MD 20743

Received & Inspected

JAN 13 2012

FCC Mail Room

January 12, 2012

Re: Petition for Undue Burden Exemption from Closed Captioning Rules

To Whom It May Concern:

This letter requests an exemption on behalf of Bethel Baptist Church in Greenfield, Indiana from the FCC's closed captioning rules based on undue burden. The original and two copies of this letter and all support are being provided.

Bethel Baptist Church is a donor supported non-profit organization under the laws of the state of Indiana. Since 2006, we have produced a weekly 30-minute television program. The program teaches and inspires viewers how to develop their relationship with God and is produced locally by the Bethel Baptist Church staff. It is broadcast to the public on WHMB-TV throughout Central Indiana. Bethel Baptist Church pays WHMB-TV \$625.00 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons:

1. We do not have the financial resources to caption the program ourselves. Our research has determined it would cost \$5,000-8,000 to purchase the necessary equipment and the church is unable to take on that cost at this time.

2. Being a small church, production of the program is done by a few volunteers and the additional expertise and manpower to caption each program is not available.
3. We've also explored closed captioning services. This would cost an additional \$250 per week or \$13,000 per year. The added cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHMB-TV's air date deadlines impossible.
4. WHMB-TV does not provide closed captioning and has said it is unlikely to do so in the foreseeable future because of the additional time and staff that would be required.
5. As a church, we have not attempted to solicit sponsorships specifically to pay for the cost of closed captioning, but we do have a special designation spot on our weekly giving envelopes, one copy of which is attached to the application.

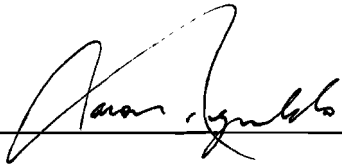
Providing closed captioning would ultimately cause us to either terminate or severely limit production of the program and cause us to lose supporters who would no longer be able to regularly view the program.

While Bethel Baptist Church recognizes the importance closed captioning can have, based on the above facts set forth in this letter, we respectfully request that Bethel Baptist Church be granted an undue burden exemption from the captioning requirements.

Respectfully:

Bethel Baptist Church

By:



Printed Name: Reverend Aaron Reynolds

Title: Youth Pastor, Program Producer

BETHEL BAPTIST CHURCH
FINANCIAL REPORT
2011 Year End

Received & Inspected

JAN 13 2012

FCC Mail Room

General Fund Checking Beginning Balance:	\$2,227.27
Offerings Received:	\$568,941.82
TOTAL CREDITS:	\$571,169.09

After dispersing to designated accts.

<u>EXPENSES</u>	<u>AMOUNT</u>	<u>MEMO</u>
Advertisement	\$3,758.00	
Awana	\$2,688.79	
Personnel	\$330,890.52	
Bank Fees (Safety Dep. Box)	\$1,286.38	
Building & Grounds (Maintainance / Equip.)	\$29,686.37	→ Up keep on mowers, piano, gas for mowers, Plymate (mats for church)
Buses & Jr. Church	\$6,974.78	Koorsen, Circle City Alarm, flowers, general up keep on building, Hobbs work on buses & vans
Church Car	\$3,167.41	
Cleaning ,cleaning people,supplies	\$14,941.17	
Conference Expense	\$1,154.81	
Guest Speaker (Offerings / Expenses):	\$7,533.53	→ The Warren's, Mark Walters, Dumplin Valley Trio, Mike Speck, Bobby Sanders
Holiday Expense	\$636.79	
Insurance (Bldgs & Vehicles)	\$13,828.97	
Insurance (Medical)	\$52,278.52	
Monthly Utilities:	\$30,765.27	
Benevolence	\$5,931.01	→ Flowers for funerals & sick, funeral dinners, cards, money to help families out, some money came back in for this.
Mission Trips	\$652.75	
New Members	\$114.82	
Office Supplies & Expenses:	\$13,257.86	
Parsonage	\$100.00	
Continuing Education	\$1,000.00	
Petty Cash	\$3,000.00	
Preachers vacation	\$568.92	
Printing & Literature:	\$5,042.98	
Special Events:	\$15,597.08	→ Picnic & Carnival, (greenfield tent, Fisk, Bluebird, Dave's meat market, space walk of Greenfield, men's retreat, senior trip, golf outing, ladies conference, Secret Pal banquet (monies came in for these) Friend Day, Women's fellowship, Senior dinner, Secret Pal Banquet, Carolyn & Bro. Parker's birthday, Pastor & Carolyn Christmas
Sound System	\$1,291.81	
Staff Gifts	\$7,450.28	
Sunday School:	\$6,165.80	
Teens:	\$5,038.15	
Vehicle Expense	\$2,762.67	
Youth Rally	\$1,909.24	
VBS	\$1,390.01	
TOTAL GENERAL FUND EXPENSES:	\$570,864.69	
TOTAL CREDITS:	\$571,169.09	
TOTAL DEBITS:	\$570,864.69	
CURRENT BALANCE:	\$304.40	General Fund Checking Account

BETHEL BAPTIST CHURCH
FINANCIAL REPORT
2011 Year End

Video Checking Beginning Balance:	\$3,815.32
Offerings Received:	\$36,212.67
Total Credits:	\$40,027.99
Total Debits for Television Ministry:	\$33,800.00
Current Balance:	\$6,227.99

Airtime and Equipment

Master's Class Checking Beginning Balance:	\$3,690.31
Offerings Received:	\$8,581.05
Total Credits:	\$12,271.36
Master's Class Debits:	\$11,100.00
Current Balance:	\$1,171.36

Preacher \$3,600 to Mexico, \$5,000.00 youth camp, gave \$2,500.00 to missions for Christmas.

Mortgage Checking	\$61,641.59
Transfers from the General Fund:	\$245,943.81
Total Credits:	\$307,585.40
Total Debits (Paid on mortgage):	\$249,817.49
Current Balance:	\$57,767.91

All mortgage payments are paid from this account, church car, Preacher's hearing aids, new mower (money came in) Mike Speck

Mission's Checking Beginning Balance:	\$19,289.89
Offerings received:	\$116,962.67
Total Credits	\$136,252.56
Total Debits: Support	\$131,539.72
Current Balance:	\$4,712.84

For Missions support and extra projects for Missionaries

Certificates of Deposit Beginning Balance:	\$202,978.47
Cashed in CD in February	\$101,767.39
	\$101,211.08
Interest Earned for 2011	\$904.03
Current Balance:	\$102,115.11

Summary of Accounts / Balances

General Fund Checking:	\$304.40
Missions Checking:	\$4,712.84
Video Checking:	\$6,227.99
Master's Checking:	\$1,171.36
Mortgage Checking:	\$57,767.91
Certificates of Deposit:	\$102,115.11
Total of All Accounts:	\$172,299.61
Total Cash On Hand:	

Total Income for Year End 2011

Video Acct.	\$36,212.67
Master's Acct	\$8,581.05
Mortgage Acct.	\$245,943.81
Mission's Acct	\$116,962.67
General Fund	\$571,169.09

Debits for Year End 2011

Video	\$33,800.00
Master's	\$11,100.00
Mortgage	\$249,817.49
Missions	\$131,539.72
General	\$570,864.69

Total Income year end 2011 **\$978,869.29**

\$997,121.90

Negative \$18,252.61

My Tithes and offerings unto God through

Date _____

Bethel Baptist Church

1610 S. State St.
Greenfield, IN 46140

Name _____

Address _____

Baptist Church
Bethel

TITHE

Amount \$ _____

MISSIONS

"Go ye into all the world, and preach the
gospel to every creature."

Regular Missions \$ _____

Other _____ \$ _____

Other _____ \$ _____

Total Missions \$ _____

SPECIAL

Mortgage Fund \$ _____

T.V. Broadcast \$ _____

Other _____ \$ _____

Total Special \$ _____

You may write one check for all your offering

Total Amount Enclosed _____

From: Cathy Clossin <cclossin@lesea.com>

To: absixstring <absixstring@aol.com>

Subject: RE: Bethel Baptist

Date: Thu, Jan 12, 2012 11:55 am

Attachments: FCC_UNDUE_BURDEN_EXEMPTION_2012_FILING_INSTRUCTIONS.doc (50K),
Undue_Burd_Exemption_2012_filing_instructions.pdf (55K), FCC_letter_example.doc (53K),
CLOSED_CAPTIONING_WHMB_QUOTE.doc (2442K)

Aaron,

Here is your alternative right now. I've attached four letters. One is explaining a reason for exemption to closed captioning (FCC letter example). The second one is a quote from TV 40 (CC WHMB Quote) about the cost of doing CC for you. Third is the filing information and the fourth is the information (pdf file) that is required in the petition. If you can take this information, edited to fit Bethel and mail it to the FCC (has to be there by 1/18), then we start the procedure all over again that we did 2 years ago. You should receive a letter confirming the FCC received your request and you'll be exempt from CC until they rule. Make sure that you have done this. If you don't have written examples (sponsorships) don't worry about it. If anything is incomplete, I'm sure you be asked to provide more info. The key is getting

something to the FCC by the 18th.

Again, I'm sorry about this and we are working on other solutions and I'll keep you informed as I receive any news concerning CC.

Thanks (isn't enough really)!



Cathy Clossin
Account Executive

WHMB-TV 40

Phone: 317-773-5050

Fax: 317-776-4051

*"Serving Indianapolis for 39 years
with the best in family entertainment."*

lesea  **broadcasting**  **network**

From: absixstring@aol.com [<mailto:absixstring@aol.com>]

Sent: Thursday, January 12, 2012 10:22 AM

To: Cathy Clossin

Subject: Bethel Baptist

Cathy

I relayed all of the information to the pastor. I'm going to be honest with you, we will probably need a better solution to the closed captioning than the ones I have thus far found.

The best software price I have seen is \$7000, but even if that price were half of that, we are looking at a large amount of time, time that I really really do not have to do the extra work.

I am also the youth and children's pastor here at the church, and that is pretty much a full time job outside of all

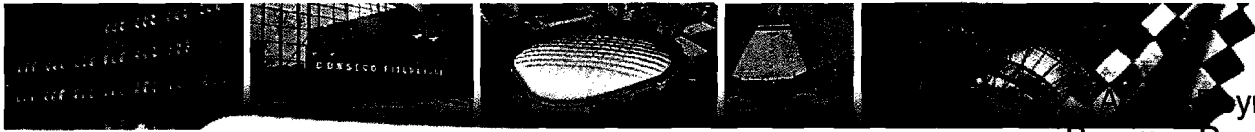
television work.

The other option of having the service done for us is one I explored as well. The cheapest FULL service (transcription and captioning) I could find was \$15 per minute, which would equate to close to \$20,000 per year to continue our program. The people of the church want the program to remain, as does the pastor, but we really need to hear a better solution at this point to see a good chance of this thing surviving. I am not trying to just be a naysayer here, I am just wondering if your people have found any other options.

So...two things:

1. If you find anything we could use, please let me know as soon as you find it.
2. What is the time frame that we are up against where we are legally required to have the closed captioning in place? (or are we already there?)

Hoping for a good resolution,
Aaron



Synolds
Program Producer
Bethel Baptist Church
1610 S. State Street
Greenfield, IN 46160

January 10, 2012

Aaron,

This letter is in response to your request for LeSEA Broadcasting to research the process and cost associated with closed captioning your television program that currently airs on WHMB-TV.

There are two ways to approach this issue:

- Purchase the captioning software/hardware and do the closed captioning yourself. Research by both the WHMB-TV production and engineering staffs has discovered the cost of this equipment will be in the \$5,000-8,000 range. The CC process involves multiple steps. First, the program must be transcribed word-for-word into an electronic document. Second, the script is entered in the CC software. Third, the software drops the script onto a timeline of the program. Fourth, the program can then be outputted with the embedded CC. In our experience, we've noted that it takes 4-6 hours to CC a 30-minute program such as yours.
- Outsource the closed captioning to an outside provider. Again, we've researched this solution and have discovered the cost to be approximately \$250 per program.

WHMB-TV does not currently offer in-house closed captioning services. Because closed captioning is such a labor-intensive process, we would have to hire additional staff to perform this task and that is not economically feasible at this time.

I hope this information answers your questions about the closed captioning process and the associated costs. Please don't hesitate to contact me with any further questions.

Sincerely,

Cathy Clossin
WHMB-TV